

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

IN RE:

AUSTIN J. DANIEL

DEBTOR.

§
§
§
§
§

**CASE NO. 17-11842
CHAPTER 13**

NOTICE OF MOTION TO MODIFY PLAN

PLEASE TAKE NOTICE that the Debtor has moved to modify his confirmed plan. Any interested party objecting to the Motion must file a written objection with the Clerk of the United States Bankruptcy Court for the District of Maryland, 101 W. Lombard St., Baltimore MD 21201, within thirty (30) days from the date of this notice setting forth in detail the basis of said objection with a copy being sent to the undersigned. If an objection is filed, a hearing on the objection will be held on December 1, 2020, at 10:00 AM, in Courtroom 2-A,

U.S. Courthouse
Baltimore Division
101 W. Lombard St.
Baltimore, MD 22101

A copy of the proposed modification accompanies this Notice.

DEBTOR'S MOTION TO MODIFY PLAN

NOW COMES **Austin J. Daniel**, Debtor in the above-captioned bankruptcy case, by the undersigned counsel, and moves to modify his Chapter 13 Plan as follows.

1. Debtor filed this case under Chapter 13 on February 10, 2017. His confirmed plan calls for plan payments of \$ \$1,586.78 total for the first 23 months; then \$150 per month for twenty four (24) months, for a total of 47 months.

2. The Debtor has fallen behind on plan payments due to issues of job loss. He

regained employment, but then again lost work due to Covid-19.

3. The Debtor has paid to date \$2656.78 into the plan (in addition to adequate protection payment to his car lender) over the first 43 months since filing. The modified plan proposes to pay a reduced \$61.71 per month for 41 more months, extending the term to a total of 84 months, keeping the plan funding nearly the same but simply extending the term to the extent allowed by the CARES Act.

4. The proposed modified plan meets all requirements for confirmation, and should be confirmed.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order confirming the modified plan filed herewith.

Dated: October 6, 2020.

Respectfully submitted,

/s/Daniel M. Press
Daniel M. Press #07300
CHUNG & PRESS, P.C.
6718 Whittier Avenue, Suite 200
McLean, Virginia 22101
(703) 734-3800
dpress@chung-press.com

CERTIFICATE OF SERVICE

I certify that on the 6th day of October, 2020, I caused Debtor's Motion to Modify Chapter 13 Plan (with proposed modified plan attached) to be served by CM/ECF on:

Michael J. Klima bankruptcy@peroutkalaw.com

Robert S. Thomas ECF@ch13balt.com, rthomas13@ecf.epiqsystems.com

and by first class mail postage prepaid upon all creditors on the attached matrix.

/s/Daniel M. Press
Daniel M. Press

Label Matrix for local noticing
0416-1
Case 17-11842
District of Maryland
Baltimore
Tue Oct 6 22:21:14 EDT 2020

Atlas Acquisitions LLC
Attn: Avi Schild
294 Union St
Hackensack, NJ 07601-4303

Capital One Auto Finance
a division of Capital One, N.A.
P.O. Box 165028
Irving, TX 75016-5028

Capital One Auto Finance, A Division of Capi
c/o Michael J. Klima, Jr.
8028 Ritchie Highway
Suite 300
Pasadena, MD 21122-1360

Baltimore
Baltimore Division
101 West Lombard Street, Ste. 8530
Baltimore, MD 21201-2605

American InfoSource LP as agent for
Verizon
PO Box 248838
Oklahoma City, OK 73124-8838

Anne Arundel County, Maryland
Office of Law
2660 Riva Road, 4th Floor
Annapolis, MD 21401-7055

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

BG&E
PO Box 1475
Baltimore, MD 21203-1475

BMW Mini of Annapolis
21 Old Mill Bottom Rd
Annapolis, MD 21409

Capital One Auto Finance
PO Box 255605
Sacramento, CA 95865-5605

Capital One Auto Finance,
c/o Ascension Capital Group
P.O. Box 201347
Arlington, TX 76006-1347

Capital One Auto Finance, a division of Capi
AIS Portfolio Services, LP
4515 N Santa Fe Ave. Dept. APS
Oklahoma City OK 73118-7901

Comcast
5801 Metro Dr
Baltimore, MD 21215-3204

Comenity Bank
PO Box 182120
Columbus, OH 43218-2120

(p)COMPTROLLER OF MAYLAND
BANKRUPTCY UNIT
301 W PRESTON ST ROOM 409
BALTIMORE MD 21201-2396

(p)DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

ERC
PO Box 23870
Jacksonville, FL 32241-3870

First Credit Services Inc
377 Hoes Ln Ste 300
Piscataway, NJ 08854-4138

GFC Lending, LLC
PO Box 29018
Phoenix, AZ 85038-9018

GO Financial
PO Box 53087
Phoenix, AZ 85072-3087

Golds Gym International
125 E John Carpenter Fwy Ste 1300
Irving, TX 75062-2366

Johns Hopkins University Clinical Practi
PO Box 64896
Baltimore, MD 21264-4896

LVNV Funding
PO Box 10584
Greenville, SC 29603-0584

LVNV Funding, LLC its successors and assigns
assignee of FNEM, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Midland Funding
8875 Aero Dr Ste 200
San Diego, CA 92123-2255

Midland Funding, LLC
Midland Credit Management, Inc. as
agent for Midland Funding, LLC
PO Box 2011
WARREN, MI 48090-2011

PEROUTKA, STEPHEN G
8028 RITCHIE HWY,STE 300
Pasadena, MD 21122-1360

Patient First
PO Box 758941
Baltimore, MD 21275-8941

Patient First c/o Receivables Management Sys
PO Box 8630
Richmond, VA 23226-0630

Quantum3 Group LLC as agent for
Comenity Capital Bank
PO Box 788
Kirkland, WA 98083-0788

Receivables Management
7206 HULL STREET RD SUITE 211
Richmond, VA 23235-5826

Richie Automotive
98 GEORGIA AVE NE
Glen Burnie, MD 21060-6829

Security Credit Services LLC
2653 W Oxford Loop
Oxford, MS 38655-2929

Southwest Credit
4120 International Pkwy
Carrollton, TX 75007-1958

State Of Maryland CCU
300 W Preston St
Baltimore, MD 21201-2308

State of Maryland DLLR
Division of Unemployment Insurance
1100 N. Eutaw Street, Room 401
Baltimore, MD 21201-2225

Synchrony Bank
PO Box 965064
Orlando, FL 32896-5064

(p)TEMPOE LLC DBA WHY NOT LEASE IT
ATTN BOB HOLWADEL
720 EAST PETE ROSE WAY SUITE 400
CINCINNATI OH 45202-3576

Tora Newell
30 Sandstone Ct. Apt. L
Annapolis, MD 21403-5728

Transworld Systems
PO Box 17205
Wilmington, DE 19850-7205

US Attorney for the District of Maryland
36 S Charles St 4th Fl
Baltimore, MD 21201-3020

US Dept of Education
PO Box 5609
Greenville TX 75403-5609

Verizon
500 Technology Dr
Weldon Spring, MO 63304-2225

West Creek Finance
PO Box 5518
Glen Allen, VA 23058-5518

Austin J Daniel
307 Maple Tree Drive
Apt 4A
Glen Burnie, MD 21060-8580

Daniel M. Press
Chung & Press, P .C.
6718 Whittier Ave., Ste. 200
McLean, VA 22101-4531

Robert S. Thomas II
300 E Joppa Road, Suite 409
Towson, MD 21286-3005

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Comptroller of the Treasury
Compliance Division, Room 409
301 W. Preston Street
Baltimore, MD 21201

Discover
PO Box 15316
Wilmington, DE 19850

Tempoe, LLC
1750 Elm St #1500
Manchester, NH 03104

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)CBCS

INVALID ADDRESS PROVIDED

End of Label Matrix

Mailable recipients 48

Bypassed recipients 1

Total 49